

Maya Gee

(b) (6)

09/16/2011 08:57 PM

To Elizabeth Allen

cc Karen BISHOP, Richard Kauffman, Eron king, Gary Hale,  
Stuart Turner

bcc

Subject Fwd: question

Hi Elizabeth,

Can you please let us know what are good dates/times for a little conference call in regards to our air study, and we'll check in with Stu and he will check in with Dr. Coddington on his availability.

See Stu's response below.

Thank you,

The Gees

----- Forwarded message -----

From: <[agforensic@aol.com](mailto:agforensic@aol.com)>

Date: Fri, Sep 16, 2011 at 9:19 AM

Subject: Re: question

To: (b) (6)

Maya,

I agree this would be helpful. EPA is not aware of our lab oriented refinement and expansion of the older, basic TO-4A method to find many more compounds, and at lower levels; Maybe including Dr. Coddington on that end would also be helpful. Should have a working draft of the basic Protocol ready for review later today, will email for review and comments. I am on the road a bit but should have good cell coverage except Monday I have family business, my oldest daughter is bringing out my new granddaughter from Indiana for a visit. Otherwise I am available, cell is always best,

[509-539-5524](tel:509-539-5524)

Best Regards,

Stu Turner, CPAg

-----Original Message-----

From: Maya Gee (b) (6)

To: Stuart Turner <[agforensic@aol.com](mailto:agforensic@aol.com)>

Cc: Karen BISHOP <[karen.bishop@state.or.us](mailto:karen.bishop@state.or.us)>; Allen.Elizabeth <[Allen.Elizabeth@epamail.epa.gov](mailto:Allen.Elizabeth@epamail.epa.gov)>;  
Eron king (b) (6)

Sent: Fri, Sep 16, 2011 9:05 am

Subject: Re: Re: question

Hi Stu,

We think it would be beneficial for you and Elizabeth Allen from EPA to have a conversation via phone in regards to our air study.

See the e mails below. She is very interested in hearing our strategy and offering her expertise, which we very much so appreciate.

We would like to set up a conference call with us all.

Please let us know.

Thank you!

The Gees

On Thu, Sep 15, 2011 at 11:01 AM, Karen BISHOP <[karen.bishop@state.or.us](mailto:karen.bishop@state.or.us)> wrote:

Hi there,

I thought I'd pass this e-mail chain along to you. Do you have all the information you need? If you wanted to set up a call between yourselves, Stu and Elizabeth, it sounds like that might be a good idea.

Best,

Karen

>>> <[Allen.Elizabeth@epamail.epa.gov](mailto:Allen.Elizabeth@epamail.epa.gov)> Thursday, September 15, 2011 8:23 AM >>>

Hi Karen,

that's fine, but I don't think it something I haven't already told them. I suspect there's a lot more going on with the sampling that I'm aware of, but I haven't really seen any details.

Elizabeth

-----"Karen BISHOP" <[karen.bishop@state.or.us](mailto:karen.bishop@state.or.us)> wrote: -----

To: Elizabeth Allen/R10/USEPA/US@EPA

From: "Karen BISHOP" <[karen.bishop@state.or.us](mailto:karen.bishop@state.or.us)>

Date: 09/14/2011 09:13AM

Subject: Re: question

Thank you Elizabeth,

I appreciate your expertise and dedication to this. Would you mind if I shared this with the Gees?

-Karen

>>> <[Allen.Elizabeth@epamail.epa.gov](mailto:Allen.Elizabeth@epamail.epa.gov)> Tuesday, September 13, 2011 6:29 PM >>>

Karen,

all I have is information that Dan and Maya sent to Richard Kaufmann, and that included a pdf file from the manufacturer of the Hi-vol sampler. I looked at their web site, and found the reference to TO-4A as the recommended analysis. Then I looked up the analyte list for TO-4A, and only atrazine and 2,4-D were listed on the target list. That doesn't mean that Air Toxics, the lab that will be doing the analysis, hasn't modified the method, and since TO-4 was published EPA has more or less gone to performance-based methods. I could call Heidi Hayes, the technical director at the lab and ask in a general sense if they can detect other analytes, but I doubt she can provide specifics about this instance. They might be using another method, I don't know, I haven't seen a sampling plan or anything resembling a QAPP. I don't know any actual specifics about the sampling they are doing, other than they plan to have more than one sample collected. So other than the fact that I have a lot of experience with and confidence in Air Toxics, while we'll likely believe the results, there might not be much more we can do with the data. And I'd certainly recommend having a discussion with the DEQ lab before using the data in anything you might put together,

As I mentioned, my conceptual model is that air concentrations of the vapor phase herbicides is likely most prevalent during and after

spraying, and may drop off at a currently undetermined rate. I know HQ would like to know, and I'm hoping to use that as a partial funding mechanism. But if the lab analysis isn't looking for analytes other than atrazine and 2,4-D, well, I'd be a little bit surprised to detect those two in the fall. I emailed the Gees and offered to have a conference call with them, their consultant, myself, and our lab folks to answer any questions and look at any other info they wanted to provide, but never heard back from them. More so than wanting to use the data, I'd like to see the Gees get good value for their money.

Elizabeth

From: "Karen BISHOP" <[karen.bishop@state.or.us](mailto:karen.bishop@state.or.us)>  
To: Elizabeth Allen/R10/USEPA/US@EPA  
Date: 09/13/2011 03:42 PM  
Subject: Re: question

Hi Elizabeth.

So you have reviewed the information from the manufacturers of the sampling devices themselves, but Stu Turner is providing them with guidance that you're not sure it will capture what we are looking for. Do I have that right? I'm a little nervous because they really want to conduct the monitoring in such a way that it will be valuable data, useable for us in our assessment. I just want to make sure that someone is advising them on how to do that, since that is a big expectation. I'm wondering who might be able to follow up with them on how things are going. Any thoughts?

Thanks,  
Karen

>>> <[Allen.Elizabeth@epamail.epa.gov](mailto:Allen.Elizabeth@epamail.epa.gov)> Tuesday, September 13, 2011 10:02 AM >>>  
Hi Karen,

well, I looked at the information they sent, which was promotional material from the manufacturer. They are using a high-volume PUF sampler, which will collect a sample over 24 hrs. But I believe they are using Stuart Turner to select the equipment and collect the samples. We have several such samplers at our lab, but they do require power (the California Department of Pesticide Registration has used 12-volt car batteries). Without a proper filter, it may not be possible to determine whether any detected analytes were present in the vapor phase or adhered to airborne dust, and I don't know how they intend to measure whether the dusts are of respirable size. My conceptual model is that volatilization of the herbicides probably falls off fairly steeply after application, and I'm not sure that the method that Stu Turner is using can get the low detection limits I think they'll need. Also, he was proposing using EPA Method TO-4A, and only atrazine and 2,4-D are on the analyte list (the method is actually for vapor phase PCBs and chlorinated insecticides), and neither compound is typically sprayed in the fall, and not on Weyerhaeuser's notifications. Perhaps Air Toxics has modified the method. I can check.

Elizabeth

From:"Karen BISHOP" <[karen.bishop@state.or.us](mailto:karen.bishop@state.or.us)>  
To:Elizabeth Allen/R10/USEPA/US@EPA  
Date:09/13/2011 09:30 AM  
Subject:question

Hi Elizabeth,  
I'm wondering if you are the person who has been in touch with the Gees regarding their air monitoring. I'm asking because it hasn't been clear to us who is working with them to ensure their data will be usable. Are you?  
Thanks,  
Karen

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